

## **REMARKS**

### **I. Introduction**

Claims 1-7 and 14-30 are pending in the current application. In the Office Action dated July 20, 2006, the Examiner rejected claim 23 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Additionally, claims 1-7 and 14-30 were rejected under 35 U.S.C. §102(b) as being unpatentable over U.S. Pat. No. 5,587,854 ("Sato"). However, the Examiner noted that claim 30 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In this Amendment, claim 14 has been amended and claims 31-33 have been added. Applicant respectfully requests reconsideration of the claims and withdrawal of the rejection in light of the following remarks.

### **II. Rejection Under 35 U.S.C. § 112, Second Paragraph**

Claim 23 was rejected as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Examiner asserted it is unclear how the limitations of claim 23 can coexist with the limitations of the its parent claims. The Examiner asserted that it is unclear how the second engager and engaging member can be separate as implied in the parent claims, and integrated as in claim 23. Applicants respectfully disagree with the Examiner and submit that the parent claims of claim 23 do not imply that the second engager and engaging member are integrated or distinct. Applicants respectfully request reconsideration.

### **III. Sato Does Not Anticipate Independent Claim 1**

Independent claim 1 recites that a driving unit is locked in a case when a locking member is in a locked position, and that a connector is operable to connect to an apparatus body when the locking member is in the locked position. Therefore, when a locking member is in a locked position, both a driving unit is locked in a case and a

connector is operable to connect to an apparatus body. Sato fails to disclose at least these elements.

In the Office Action dated July 20, 2006, the Examiner asserted that Sato includes two locked positions. In one locked position, it is asserted that a driving unit is locked in a case even though the connector cannot connect to an apparatus body, and in the second locked position, it is asserted that a connector is operable to connect to an apparatus body even though the driving unit is not locked in the case. Applicants respectfully submit that the two asserted locked positions do not anticipate the single locked position of claim 1. As explained above, claim 1 recites a single locked position where both a driving unit is locked in a case and a connector is operable to connect to an apparatus body. Sato fails to disclose a single locked position which meets these elements.

Due to the fact Sato fails to disclose a driving unit that is locked in a case when a locking member is in a locked position, and a connector that is operable to connect to an apparatus body when the locking member is in the locked position as recited in claim 1, Sato, as contemplated by the Examiner, cannot anticipate claim 1, or any claim that depends on claim 1. Applicant respectfully requests reconsideration and withdrawal of the rejection to the claims.

#### **IV. Sato Does Not Anticipate Independent Claim 14**

Independent Claim 14 recites a driving unit that is locked in a case when a locking member is in a locked position, and a connector that is operable to connect to an apparatus when the locking member is in the locked position. As explained above, Sato fails to disclose a single locked position where both a driving unit is locked in a case and a connector is operable to connect to an apparatus. For at least this reason, Sato, as contemplated by the Examiner, cannot anticipate claim 14, or any claim that depends on claim 14. Applicant respectfully requests reconsideration and withdrawal of the rejection to the claims.

#### **V. Sato Does Not Anticipate Independent Claim 24**

Independent claim 24 recites a driving unit that is locked in a case when a locking member is in a locked position, and a connector that is operable to connect to an apparatus when the locking member is in the locked position. As explained above, Sato fails to disclose a single locked position where both a driving unit is locked in a case and a connector is operable to connect to an apparatus. For at least this reason, Sato, as contemplated by the Examiner, cannot anticipate claim 24, or any claim that depends on claim 24. Applicant respectfully requests reconsideration and withdrawal of the rejection to the claims.

**VI. Sato Does Not Anticipate Dependent Claims 31-33**

Even if Sato were misinterpreted to anticipate independent claim 1, 14, and 24, Sato does not anticipate dependent claim 31-33. Dependent claim 31-33 recite that a case is operative to be inserted into an apparatus body with the driving unit. In Sato, as shown in Figure 3, the case unit is not inserted into the apparatus body with the driving unit.

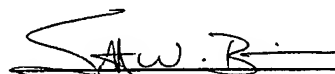
**VII. Objection to Claim 30**

Applicant thanks the Examiner for the indication of allowability of claim 30 if rewritten in independent form.

### VIII. Conclusion

In view of the foregoing remarks, Applicant submits that the pending claims are in condition for allowance. Reconsideration is therefore respectfully requested. If there are any questions concerning this Response, the Examiner is asked to phone the undersigned attorney at (312) 321-4200.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S.W. Brim", is written over a horizontal line.

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